

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Transition from TTY to Real-Time Text)	CG Docket No. 16-145
Technology)	
)	
Petition for Rulemaking to Update the)	CN Docket No. 15-178
Commission's Rules for Access to Support)	
The Transition from TTY to Real-Time Text)	
Technology, and Petition for Waiver of Rules)	
Requiring Support of TTY Technology)	
)	

REPLY COMMENTS OF CSDVRS, LLC AND PURPLE COMMUNICATIONS, LLC

CSDVRS, LLC, dba ZVRS (“ZVRS”) and Purple Communications, Inc. (“Purple”) (collectively “ZVRS”), hereby submit reply comments in response to the Commission’s Further Notice of Proposed Rulemaking (FNPRM) regarding the application of real-time text (RTT) to telecommunications relay services (TRS), specifically the “costs, benefits and technical feasibility” of incorporating RTT as a feature for various forms of TRS, and “whether the incorporation of RTT into the provision of TRS operations should be mandated or only allowed.”¹

ZVRS applauds the Commission for taking another step towards its goal of facilitating a transition from an outdated text telephony (TTY) technology to a state-of-the-art RTT

¹ *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, Report and Order, and Further Notice of Proposed Rulemaking, FCC 16-169, CG Docket No. 16-145; GN Docket No. 15-178, ¶¶ 82-83 (rel. Dec. 16, 2016) (FNPRM).

technology,² and supports its continued effort to promote widespread availability and use of RTT.

While the potential benefit of RTT is well-recognized, ZVRS wishes to reiterate its position stated in the July 25, 2016 reply comments that incorporation of RTT into the provision of VRS operations should only be allowed, not mandated, otherwise it would force ZVRS to discontinue most of ZVRS and Purple's existing end user products. None of ZVRS's end-user products currently in use support RTT, and neither do ZVRS call center agent workstations. In addition, most of Purple's existing products do not support RTT. Although some of these products have the technical capability of supporting RTT, it would require substantial time and investment with development and testing before implementing RTT. Moreover, many of these products, mostly older models, simply do not have the capability of supporting RTT at all. Should the Commission require RTT support for all existing products, it would mean deactivating these products and replacing them with newer models, which is disruptive to customers and is cost prohibitive. Moreover, customers who are accustomed to using a particular product that does not have capability of supporting RTT would be required to relinquish the product.

Should the Commission mandate incorporation of RTT in VRS operations, nonetheless, ZVRS respectfully requests that the Commission, at least, apply mandatory RTT requirements prospectively for newer models scheduled for rollout rather than to replace the existing end user VRS products. In other words, the older models in use should be "grandfathered." And equally important, VRS providers should be compensated for expenses as a direct and separate cost

² *Id* at ¶¶ 1-72.

associated with the development, testing and implementation of RTT in VRS end-user products in the event the Commission mandates the incorporation of RTT.

For the reasons highlighted above, ZVRS supports the incorporation of RTT into the provision of VRS operations on a voluntary basis so as not to disrupt customer's experience where they have come to use VRS as a critical communications tool. With RTT being offered on a voluntary basis, VRS customers would continue to have options for using RTT nonetheless since there are several VRS products available in the market that support RTT.

Respectfully submitted,
/s/
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